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The Challenge of Adapting Existing Qualifications for Inclusion in the NQF: Lessons Learned from the Twinning Project in Macedonia

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The challenge of adapting existing qualifications for inclusion in the NQF

Lessons learned from the Twinning Project in Macedonia

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Abstract

Adapting existing qualifications to a national qualifications framework (NQF) and to the requirements of the European Qualifications Framework (EQF) is one of the key elements of the process of developing and establishing a country's NQF. Many countries have to tackle the challenge of adapting existing qualifications to the NQF and EQF requirements. This also pertains to Macedonia, which is currently in the process of implementing a qualifications system based on a national qualifications framework.

An international Twinning project took place in Macedonia in 2016-2017, entitled *Further improvement of the system for development and implementation of the National Qualifications Framework*. One of its three main components addressed the issue of adapting existing qualifications in Macedonia to the requirements of the Macedonian Qualifications Framework and the European Qualifications Framework.

A broad range of analyses and discussions with Macedonian experts resulted in the development of three complementary documents presenting the entire spectrum of recommendations on how existing qualifications may be included in a system based on the NQF:

- i. 'Adapting existing qualifications to the NQF and EQF requirements – recommendations for public authorities'
- ii. 'Guidelines. The role of Sectoral Qualifications Councils in the process of adapting existing qualifications'
- iii. 'Manual on Adapting Existing Qualifications to the NQF and EQF Requirements for experts involved in adapting particular qualifications'.

This report presents the general approach to solving the problem of how to connect Macedonia's educational heritage with a new overarching system, in which the national qualifications framework referenced to the European Qualifications Framework plays an important role. In addition, proposals

are included on the formal and institutional aspects of the processes of adapting existing qualifications to the NQF and EQF requirements, as well as specific work tools for experts who are analysing, assessing and modernising the qualifications in Macedonia. The report is structured to serve as a valuable inspiration for decision makers and experts undertaking similar tasks in other countries.

1. Introductory remarks

1.1

Adapting existing qualifications to the European Qualifications Framework (EQF) and National Qualifications Framework (NQF) requirements should be understood as a task for each country implementing EQF principles in its national qualifications system. This task should be treated as a large-scale project.

Adapting existing qualifications to the NQF and EQF requirements enables them to be included in the NQF system in accordance with the provisions of the Macedonian Law on the National Qualifications Framework. Adapting existing qualifications to the National Qualifications Framework (NQF) and therefore, the requirements of the European Qualifications Framework (EQF), is one of the key elements of the process of developing and establishing an NQF-based qualifications system in a country. The end of the inclusion process allows one to acknowledge that the NQF system is established.

1.2

To conduct the adapting process efficiently, a relevant methodology needs to be developed. Two perspectives should be distinguished within this methodology of adapting existing qualifications:

i. The perspective of the NQF and EQF systems

The process of adapting existing qualifications to the NQF and EQF requirements as the responsibility of public authorities (national level) is understood as the set of activities undertaken by public authorities and appointed public and private entities to adapt national qualifications to the NQF and EQF requirements. The methodology of adapting existing qualifications at the national level is the subject of the recommendations addressed to decision-makers. The role of Sectoral Qualifications Councils (SQC) in the process of adapting existing qualifications is the subject of the Guidelines.

ii. *The perspective of a particular qualification*

The process of adapting a particular existing qualification to the NQF and EQF requirements, such as, among others, assigning a level to a qualification, is understood as: analyzing the given qualification for the purpose of modifying it to meet the NQF and EQF requirements and introduce appropriate modifications. The methodology of adapting existing qualifications at the level of a qualification is the subject of the manual addressed to expert group members involved in adapting existing qualifications to the NQF and EQF requirements.

1.3

The recommendations addressed to Macedonian decision-makers, guidelines addressed to Sectoral Qualifications Councils in Macedonia and the manual for Macedonian experts were prepared within the framework of the EU-funded Twinning Project (MK 13 IPA SO 02 15) *Further improvement of the system for development and implementation of the National Qualifications Framework*. The content of these materials was discussed with national stakeholders at all stages of its development. Recommendations, guidelines and the manual, which were prepared in Macedonia concern the procedures of adapting both formal education qualifications as well as qualifications awarded outside the formal education system. These materials may be useful to groups of experts involved in reforming formal and non-formal education programmes today and in the future. The authors would like to express their gratitude to: Natasha Janevska, Borco Aleksov, Aspasiya Hadzisce, Nada Stoimenova, as well as representatives of different institutions and stakeholders who provided valuable support throughout the entire process of preparing these documents.

2. Adapting existing qualifications to the NQF and EQF requirements as a task for public authorities

2.1 The main tasks of public authorities in the process of adapting existing qualifications to the NQF and EQF requirements are:

- To review existing qualifications in the country and decide which ones must be adapted to NQF requirements.
- To adapt the selected existing qualifications to the NQF and EQF requirements and to include them in the NQF-based system.

To conduct the process of adapting existing qualifications to the NQF and EQF requirements in the country, public authorities must take the relevant decisions. They must determine the relevant division of tasks between institutions and bodies and provide them with the adequate authorisation

to implement these tasks. They also need to ensure adequate human and financial resources. Public authorities must also determine the rules of conducting the adaptation process, which are necessary to ensure the transparency and reliability of the process of adaptation of existing qualifications to NQF and EQF requirements. The set of activities must be conducted by defined actors within a specified timeframe.

2.2 For different groups of qualifications, different approaches to reviewing and adapting are needed. Qualifications awarded in formal education (general, VET, higher education) are most often regulated by relevant legal acts. Adapting these qualifications to NQF requirements requires, therefore, not only the preparation and development of appropriate modifications, but also the introduction of relevant legislative process. This is why the process has such a long time frame.

In Macedonia, the modernisation of formal education programmes was conducted for three-year and four-year VET, adult education, the higher education sectors, and there are plans to include other sectors of formal education in the modernisation process. The planned outcomes of the modernisation activities are new educational programmes, which should be coherent with the NQF and EQF requirements. For this reason, public authorities do not need to undertake additional activities in order to adapt these groups of qualifications to the NQF and EQF requirements. It was the same in Poland, where relevant reforms were introduced in the formal education system before the legislation was passed to introduce a qualifications system based on the Polish Qualifications Framework.

2.3 The recommendations addressed to Macedonian decision-makers mainly concern qualifications awarded outside of formal education (e.g. adult education, post-secondary, professional). Based on a detailed analysis of legal acts and other documents, interviews conducted in various institutions and numerous working meetings with the relevant stakeholders, experts and public authorities in Macedonia, our recommendations listed seven main tasks that should be implemented:

Task 1. Appoint a body or institution in charge of the whole process of adapting existing qualifications to guarantee the coherency of all elements of this process. This body or institution should indicate the entities or institutions responsible for particular parts of the process of adapting existing qualifications.

Commentary:

'Appoint' in this context should be understood as the prerogatives provided in legislation or by formal decision of the relevant authority. The term *'in charge of'* means the general coordination of the process of adapting existing qualifications in the national system. The term *'responsible'* means the duty of conducting the particular part of the adapting process of existing qualifications.

Task 2. Determine a time frame for adapting qualifications to NQF requirements.

Commentary:

The timeframe of the process of adapting qualifications to NQF requirements should be an official decision of the competent body that will be binding for all entities and institutions responsible for the adaptation process. The timeframe should also indicate the list of tasks and institutions responsible for implementing them. The time envisaged for the process of adapting existing qualifications should be several years.

Not defining the timeframe imposes the risk of an excessively prolonged process of adapting existing qualifications in the country. Not completing the process of adapting existing qualifications will not allow the NQF to be fully implemented.

Task 3. Appoint an institution or institutions that decide which existing qualifications must be adapted.

Commentary:

The appointed body may issue a decision indicating which qualifications will be adapted to NQF requirements and the selection criteria (see Task 4). The decisions of this same body should also indicate which institutions will be responsible for adapting particular qualifications and the time frame of this activity.

Task 4. At the same time as Task 3, determine the national general criteria of selecting existing qualifications for adaptation.

Commentary:

The national general criteria of selecting existing qualifications for adaptation to NQF requirements (and at the same time to include these qualifications in the NQF system) should be defined. These criteria should be available to the public. The national general criteria of selecting existing qualifications for adaptation to NQF requirements may relate to:

- the development strategy of a country (e.g. importance of a given sector for economic growth),
- labour market needs,
- social needs,
- local traditions.

Task 5. Determine the national rules of conducting the adaptation process, especially:

- the rules of forming groups of experts who will be analysing existing qualifications and preparing proposals of modifications (e.g. experts' competency requirements, number of experts, procedure of appointing experts, timeframe of performing the work),

Commentary:

The competencies of experts are the most important element in the adaptation process. The competent body should define the competency requirements for experts who will be involved in adapting existing qualifications. These competency requirements should be binding for each institution involved in the adaptation process.

- the rules of the functioning of a group of experts analysing existing qualifications and preparing proposals of modification (procedures, documents, final outcome).

Commentary:

The rules of the functioning of a group of experts analysing existing qualifications and preparing proposals of modification (procedures, documents, final outcome) should be clearly defined. These rules should be available to the public. The lack of established common rules and procedures of this group's functioning will eventually lead to the lack of coherence and inability to compare the outcomes of the work of these expert groups. As a result, the NQF will lose its credibility in the domestic and international perspectives.

- formal instructions on the methods of analysing existing qualifications to adapt them to the NQF and EQF requirements.

Commentary:

Formal instructions on the methods of analysing existing qualifications to adapt them to the NQF and EQF requirements should be accepted by the body in charge of the adaptation process. Formal instructions should be included in the official manual for experts who will be analysing and modifying particular existing qualifications. The manual should include instructions on required procedures on adapting (analysing and modifying) qualifications and supporting comments. The manual will guarantee a coherent and transparent national qualifications system, which will enhance mutual trust of the national qualifications within the country and in Europe.

- the sources and rules of financing the activities of experts involved in the adaptation process,

Commentary:

Relevant national authorities should establish financial plans and resources for the functioning of the expert groups working on the adaptation process. Financial support must be ensured to conduct the process of adapting existing qualifications. Insufficient financial resources may lead to a failure in conducting this process, which is an important part of implementing the NQF system.

- the rules of verifying and officially accepting the final proposals of expert groups, including officially assigning an NQF level to particular qualifications.

Commentary:

The rules of assigning NQF levels to existing (and new) qualifications should be clearly specified and should be binding for all processes pertaining to the implementation and development of the NQF. If each institution involved in adapting existing qualifications to the NQF and EQF requirements were to develop their own procedural rules independently, the entire qualifications system will likely not be coherent. The optimal solution would be to include the rules of assigning a level in the Law on the NQF. The credibility of the levels assigned to qualifications is an essential condition to the reliability of the qualifications system in any country.

Task 6. Determine how to denote that the adapted qualification is included in the NQF (provide relevant information on diplomas, certificates, etc., enter the qualification in the official list of qualifications referenced to the NQF).

Commentary:

Relevant national authorities should decide that all diplomas and certificates for qualifications included in the NQF-based system must directly indicate the NQF level. The manner in which the NQF level is indicated on diplomas and certificates should be standardised.

Indicating the NQF level on diplomas and certificates is essential for raising public awareness about the national qualifications system. The NQF level presented on a diploma or certificate provides important information about the qualification, which is relevant in particular for learners, employees and employers in the national and European context.

Task 7. Determine the status of those qualifications awarded before implementation of the NQF in the new qualifications system.

The logic of conducting the process of adapting existing qualifications to NQF requirements expressed in the above activities and tasks is of universal character and should be followed in every country implementing an NQF referenced to the EQF, always in accordance with the national legislation and practice¹.

3. The role of sectoral qualifications councils

3.1 Sectoral qualifications councils (SQC) in each country where they have been established must be involved in implementing national qualification policies at the sectoral level and in adapting particular qualifications. SQCs should be important actors in this process. The Macedonian Law on the National Qualifications Framework states that SQCs will conduct a wide range of activities relating to the qualifications in their sectors, especially to (article 19):

¹ see: Council recommendation of 22 May 2017 on the European Qualifications Framework for lifelong learning and repealing the recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning

- analyse the condition and trends of the labour market,
- identify the needs for all types of qualifications,
- propose qualifications for the sector or sub-sector at different levels,
- analyse and evaluate existing qualifications,
- review proposals for the inclusion of new qualifications,
- propose priorities in developing new and amending existing qualifications,
- prepare the basic profile of qualifications,
- provide opinions on the harmonisation of the occupational and qualification standards with the examination programmes,
- form a committee for the examination and verification of learning outcomes in non-formal education and training,
- promote the qualifications in the sector and the employment possibilities they offer.

SQCs are obliged by the Law on the NQF to co-operate with the National Board for the Macedonian Qualifications Framework (article 16), the Ministry of Education and Science (NQF Unit) and relevant ministries and stakeholders in a given sector.

The Law on NQF indicates the following 16 sectors (article 14):

- 1) Geology, mining and metallurgy
- 2) Civil engineering and geodesy
- 3) Graphic industry
- 4) Economics, law and trade
- 5) Electrical engineering
- 6) Healthcare and social protection
- 7) Agriculture, fishing and veterinary medicine
- 8) Personal services
- 9) Mechanical engineering
- 10) Traffic, transport and storage
- 11) Textile, leather and similar products
- 12) Food service industry and tourism
- 13) Chemistry and technology
- 14) Forestry and wood processing
- 15) Sport and recreation
- 16) Arts

3.2 In the case of Macedonia, sectoral qualifications councils are new entities, and as such, their role and manner of operation are not yet fully developed. For this reason, separate and special guidelines for the SQCs were developed by the Twinning Project containing proposals for tasks that they should perform in the process of implementing the National Qualifications Framework in the country. This guideline document is intended particularly to provide support in the process of adapting existing qualifications in a given sector. This document may also be useful to other sectoral bodies involved in the process of implementing an NQF-based system in other countries.

3.3 The guidelines indicate that adapting existing qualifications to the NQF and EQF requirements in a particular sector should be treated as a typical project to be implemented. This means that each SQC should develop a plan to undertake such a project and then implement it. It may turn out that the timeframe of the project will need to be appropriately corrected. It may also turn out that the number of experts or institutions involved in the project will need to be increased or decreased. Other modifications of the project's working plan, including the budget, may also be needed during its implementation.

3.4 The guidelines very strongly emphasise that introducing any social change requires understanding and acceptance in the local society, especially by the relevant stakeholders. Conducting dialogue with relevant stakeholders in the preparatory phase allows additional important information and arguments to be acquired which may not have been known earlier by the bodies and institutions responsible for introducing the change. In addition, dialogue builds ownership of the new solutions, which is a necessary condition of their effective implementation. This is why SQCs should be involved in dialogue with relevant stakeholders at all stages of the process of adapting the existing qualifications of their sectors.

4. Detailed instructions for experts

4.1 A set of information guiding the experts who have been commissioned the task of conducting the process of adapting particular existing qualifications to the NQF and EQF requirements has been included in a manual. These documents refer to qualifications of all types and levels, including, among others, those for general, vocational, and higher education. The manual is the result of co-operation between a group of Polish experts involved in the Twinning Project and experts from the Macedonian Ministry of Education and Science (especially the NQF Unit), VET Centre, Adult Education Centre, Bureau for Development of Education, VET schools, two universities, chamber of crafts and

representatives of employers. The manual, was tested during two pilot sessions. The results from both pilot sessions provided important input for the final version of the manual.

4.2 All social policy instruments need to be always regularly updated because of the changes in society and economy resulting from technological progress. However, in the case of adapting existing qualifications to the NQF and EQF requirements, the main task is not to improve the content of a qualification, but to harmonise a particular existing qualification with the NQF and EQF. Still, the process of adapting existing qualifications should also include necessary modifications, e.g. removing obsolete elements.

The process of adapting particular existing qualifications to the NQF and EQF requirements should consist of two stages:

Stage 1: Analysing existing qualifications for the purpose of their modification in accordance with the NQF and EQF requirements and,

Stage 2: Introducing appropriate modifications.

This manual explains how these two stages should be conducted by experts involved in the adaptation process.

4.3 The key tool in conducting the analysis is a checklist presented at the end of this manual. Analysis with the checklist should be conducted in three steps:

1. The checklist is filled in by the leading expert. In completing the checklist, the expert should be supported by a specialist/specialists from the given field and relevant stakeholders.
2. The preliminary completed checklist is reviewed by an expert not involved in any activity in the first step of the analysis. At this step, the analysed qualification is also compared to similar foreign qualifications.
3. The final version of the checklist is prepared and includes the suggestions formulated during step 2 of the analysis: the outcomes of the review and the results of the comparison with the foreign qualifications.

The analysis is led by an expert appointed by the competent body. The involved experts, specialists and stakeholders should be theoreticians and practitioners representing different roles in the labour market and education sector: employers, teachers, examiners, career counsellors, decision-makers, etc. They should have knowledge and a variety of experiences relating to the analysed qualification. Additionally, at least one expert among the persons involved in the analysis must possess general knowledge about the NQF system.

The process of the joint work of the lead expert conducting the analysis and other persons should be scheduled and documented. It is important to hold well-prepared meetings. The relevant amount of time should be ensured depending on the complexity of the work. It is also important to prepare the necessary documents for discussions in advance, and to write reports from the consultation process afterwards.

The obligatory involvement of specialists and stakeholders in conducting the analysis ensures the quality and reliability of the adaptation process. First, the experts filling in the checklist may need additional consultations in areas requiring specific professional knowledge. Second, the completed checklist should be reviewed by an expert not involved in this part of the process. Third, the comparison of the analysed qualification with foreign qualifications may influence the expert's opinion regarding particular fields in the checklist.

4.4 The checklist was designed in order to lead a person step-by-step through the analysis of an existing qualification. The checklist used for the analysis could be compared to a GPS device leading a driver to a destination. The checklist serves the same purpose – it provides comments and supporting explanations. Moreover, the checklist ensures that the experts do not omit anything or make other mistakes on the way to reaching the goal. GPS helps us to see all the important crossroads that we should be aware of. Similarly, the checklist supports experts in noticing all the important elements.

Applying a checklist to analyse existing qualifications, not only ensures avoiding omissions, but what is equally important, it ensures the quality of the analyses and the comparability of their results.

The checklist begins with an information page. This page is envisaged to provide information about the documents used in the analysis of the qualification and the names of experts conducting the analysis.

4.5 The checklist consists of 15 thematic areas grouped into 3 main sections:

- general information about the qualification,
- learning outcomes (teaching aims/objectives/results, etc.) and assessment,
- institutional aspects.

These 15 thematic areas were chosen with regard to the requirements of the European Qualifications Framework. They have been adjusted to the national context and especially, the national qualifications system.

Each of thematic areas includes 1-10 guiding questions with supporting commentaries. The experts conducting the analysis should answer the guiding questions by marking the boxes “yes” or “no” and provide relevant remarks if necessary. At the end of the checklist there is a specially devoted space for final conclusions on further steps and other comments. A checklist with the results of consultations with specialists and stakeholders and the comparisons with foreign qualifications will determine the further work on modifying a particular qualification.

4.6 The checklist covers the following main aspects of an adapted qualification:

- usefulness of skills and knowledge for the holders of the qualification, as well as for employers and society,
- relevance of the proportion of knowledge and skills compared to the competences needed by employers and holders of the qualification,
- context of attaining the qualification (formal, non-formal education and informal learning),
- verification of whether the learning outcomes are clear, transparent, measurable, achievable,
- relevance of the assessment criteria to the learning outcomes of the given qualification,
- relevance of the assessment/validation methods,
- verification of the ability to identify the NQF level for the qualification,
- clarity and comprehensiveness of the documentation on the analysed qualification,
- relevance of the institutional infrastructure for the qualification.

4.7 In a globalised economy, the same technological solutions are universally used in all countries in the world, e.g. computer operating systems, cars, mobile telephones. Therefore, the networks of distribution and services must be organised according to international standards. This requires

adequately trained staff. The qualifications of these staff persons must be developed by taking into consideration the requirements of these global technological solutions. As a result, the importance of exchanging good practices and mutually sharing experiences increases. The aim of this is to avoid unjustified differences in terms of a qualification's scope and content. This is why a comparison with parallel/similar foreign qualifications should be conducted.

Another reason to perform this comparison is the fact that different European countries have analogical occupations and professional roles (e.g. teachers, nurses, plumbers). For instance, when we are preparing the qualification of a Computerized Numerical Control (CNC) operator in Macedonia, we should compare it with the parallel/similar qualification of a CNC operator in e.g. Germany or Poland.

The process of comparing occupations and qualifications enriches the outcomes of the analyses, enabling possible modifications to be made. At the same time, the comparison may facilitate an appreciation of national achievements.

4.8 The outcomes of the analysis of an existing qualification with the use of the checklist provide the basis for defining the relevant scope of the modification. First, the completed checklist provides information about the elements of the qualification's description that are available and those that are missing to be able to adapt it to the requirements of the NQF and EQF. Second, the completed checklist indicates which elements of the analysed qualification do not fully correspond to the NQF and EQF requirements. Third, the completed checklist also includes information on which elements are obsolete or no longer valid. As a result, much information has been collected. Next, it is necessary to 'separate the wheat from the chaff', to decide which pieces of information are crucial and which can be skipped.

Defining the scope of the modification is a transitional phase between the stage of analysis and the stage of modification. Based on the information from the completed checklist, experts can decide which elements must be modified, added or removed.

4.9 When defining the scope of a modification, the following principles should be taken into consideration:

Principle 1 - Modifying is not developing a new qualification.

The qualifications selected to be adapted already exist. The value of the existing qualifications should be appreciated and the available information about them used – despite the fact that the qualifications selected for adaption are not yet fully in line with the NQF and EQF requirements and standards. This is different than developing a new qualification, when experts are starting from scratch. The starting point is the existing qualification description, in which experts have to modify selected elements. It should be kept in mind that this qualification has been functioning in the market or educational system until now and this experience and advantage should be used.

Principle 2 - Modifying is not changing the identity of a qualification.

When adapting an existing qualification, any unjustified modifications in the case of concepts which are deeply rooted in national languages or cultures should be avoided. Of course, the experts' task is to meet the requirements of the NQF and EQF, however, there might be specific cases when this will not be possible. Derogations are allowed only in justified situations. In each country, there are some traditional terms and concepts relating to the qualification that are recognisable regionally, nationally or even internationally. Sometimes changing the traditional elements of the qualification may cause misunderstanding, which affects the position of the qualification in the educational system and labour market. Changes to the traditional elements in some cases may also cause a loss in cultural heritage.

Principle 3 - Modifying is not making the content and wording of the qualification more perfect.

Modifying is not improving the qualification for the pure sake of improvements, to make the qualification's description sound better, according to the expert's subjective impression. Modifying is introducing only indispensable changes that make the qualification more coherent with the NQF and EQF requirements.

The expert who modifies the qualification should not correct the wording or terms only because they think that it may sound better. Each modification is justified insofar as it reflects the aims of adapting while achieving the maximum possible coherence with NQF and EQF requirements. Valuable improvements might be introduced, but this is not the main aim of adapting. It must be emphasised that introducing even a slight change of wording (or using a "better" word) in the qualification's description may unintentionally change the content and meaning of the learning outcomes of the qualification.

General principle: 'the fewer the changes – the better are the results'.

In the case of the adaptation process, the aim is not to create a qualification fully in line with a theoretical model. The principle 'the fewer the changes – the better are the results' is recommended. The appropriate balance should be ensured while defining the scope of the modifications.

According to the EQF recommendation², all learning outcomes state *what a learner knows, understands and is able to do on completion of a learning process and they are defined in terms of knowledge, skills and competence*. However, it may happen that the description of the existing qualification does not have explicitly defined learning outcomes. At the same time, the documentation of the qualification (the curriculum, teaching programme, examination standards, other similar documents) enables the knowledge, skills and competences required for the qualification to be identified. If this documentation enables the measurable learning outcomes to be determined, it may not be necessary to rewrite the qualification only to make the learning outcomes explicit.

4.10 All information about a particular existing qualification has been collected. Experts have identified the required modifications (introducing changes, supplementing or removing). Therefore, the relevant scope of the modification has been defined.

The actions that should be undertaken to modify the qualification are:

- to complete the missing information identified within the scope of the modification, especially regarding learning outcomes,
- to reduce outdated information defined within the scope of the modification,
- to introduce other necessary changes defined within the scope of the modification.

The above changes must be incorporated into a template designed for this purpose. It may turn out that this template needs modification. As was already stated, only necessary changes should be introduced, according to the principle ‘the fewer the changes – the better are the results’. At this stage, recommendation may be formulated regarding the templates that could be used in the future. In this way, the national qualifications system will gradually be modernised to achieve full coherence with the NQF and EQF requirements.

END

² see: Council recommendation of 22 May 2017 on the European Qualifications Framework for lifelong learning and repealing the recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning